

## THE CITY OF NEW YORK LAW DEPARTMENT 100 CHURCH STREET

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June 25, 2019

## **By ECF**

Honorable Sandra J. Feuerstein United States District Judge Eastern District of New York 100 Federal Plaza, Courtroom 1010 Central Islip, New York 11722

Re: Patricia Cummings v. The City of New York, et al., 19 CV 01664 (SJF) (SIL)
Our No. 2018-080725

## Dear Judge Feuerstein:

I am an Assistant Corporation Counsel in the office of Zachary W. Carter, Corporation Counsel of the City of New York, attorney for defendants The City of New York, NYC Mayor Bill de Blasio, Councilmember Jumaane D. Williams<sup>1</sup>, and Councilmember Daniel Dromm (together the "City Defendants"), as well as the New York City Department of Education ("DOE"), City of New York Office of Special Investigations ("OSI"); Giulia Cox, and Courtney Ware (together the "DOE Defendants").

I write to respectfully request a five page enlargement of the 25 page limit for memorandums of law for City Defendants and DOE Defendants in connection with these defendants' motion to dismiss. City Defendants and DOE Defendants will file a joint memorandum of law. Defendant Lenard Larry McKelvey a/k/a Charlamagne Tha God also requests permission to submit five additional pages in support of his respective motion to dismiss. All parties have consented to this request. The requested enlargement is necessary to adequately address plaintiff's Complaint, which contains 209 separate paragraphs.

<sup>&</sup>lt;sup>1</sup> Councilmember Williams is now the Public Advocate for the City of New York.

City Defendants and DOE Defendants thank the Court for its attention to this request.

Respectfully Submitted,

/s/ Aliza J. Balog
Aliza J. Balog
Assistant Corporation Counsel

cc: Counsel of Record (via ECF)